

I applaud the FAA's effort to make passenger aircraft safer for flight attendants and the traveling public by replacing the current 9 G aircraft seats with 16 G seats.

I'd also like to see the new seats made more compatible with child safety seats. Current child safety seats have been designed for the automobile, and, according to the 1994 CAMI (Gowdy and DeWeese, 1994) study (<http://www.cami.jccbi.gov/aam-600/630/9419.html>) may not fit well in current aircraft.

"By moving the seat belt anchor point on the passenger seat aft to the seat back recline pivot bolt, a more effective load path for restraining the (Child Restraint Device) CRDs was demonstrated. Head excursions were significantly reduced with the modified anchor point. No head contact resulted for all three CRDs tested with the new anchor point. This modified belt installation also reduced the difficulties of installing a CRD in the confined space of a passenger seat." (Gowdy and DeWeese, 1994)

In addition, decreasing the length of the webbing on the buckle side of the belt gave a better fit of the Child Safety Seat.

As a parent and a child passenger safety technician, I've installed many child safety seats on aircraft. My experiences mirrored those found by Gowdy and DeWeese. Aircraft seats with belts anchored closer to the "bight" (the crack between the seat and the seat back) gave a better angle for child safety seat installation. In addition, shorter buckle stalks helped give good fits. But many aircraft seats had neither.

Clearly, another important component to improving child passenger safety on aircraft is to mandate the use of seat belts and child safety seats for all children, including those under the age of 2. I understand that this is beyond the scope of this mandate. However, improving the fit of the belts on aircraft seats will improve the safety of children currently riding in child safety seats, and reduce the frustration level of parents who do make the effort. And perhaps by the time this mandate goes into effect, all children will be required to have their own seat, and all children under the age of 3 or 4 will be using child safety seats.

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